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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,

18 Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

) CASE NO. 20-CR-00249 RS

) STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE

19
20 This matter is currently set for a status conference on May 11, 2021, at 2:30pm. Since the
21 parties' last report to the Court, the government has continued producing a large volume of discovery.
22 The most recent production, including voluminous search warrant returns, was produced via physical
23 media on May 5, 2021. The defense team is currently reviewing those materials. The government is
24 currently processing and preparing its next production of documents.

25 The discovery in the case is voluminous, and the parties request an approximate 60-day
26 continuance in order to provide the defense with the opportunity to continue to review these discovery
27 materials, and for the government to continue producing documents. The parties will also take these
28 sixty days to explore whether this matter can be resolved via an agreement. The parties also request that

1 the Court exclude time from the Speedy Trial Act deadlines on the basis that the proposed continuance
2 will allow for the effective preparation of counsel. The parties agree that the ends of justice served by
3 this continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties
4 further agree that the failure to grant this continuance would unreasonably deny counsel for defendant
5 the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6 Accordingly, the parties agree that the period from May 11, 2021 through July 13, 2021, or the date of
7 the continued Status Conference, should be excluded in accordance with the provisions of the Speedy
8 Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking
9 into account the exercise of due diligence.

10 IT IS SO STIPULATED.

11 DATED: May 7, 2021

Respectfully submitted,

12 STEPHANIE M. HINDS
13 Acting United States Attorney

14 /s/
15 ANDREW F. DAWSON
16 Assistant United States Attorney

17 ZUBER LAWLER & DEL DUCA LLP

18 /s/
19 BRIAN J. BECK
20 Attorney for Defendant

21 **ORDER**

22 For the reasons stated in the stipulation of the parties above, and for good cause shown, the Court
23 hereby orders that the Status Conference currently set for May 11, 2021 is vacated and reset for July 13,
24 2021, at 2:30 p.m. It is further ordered that time is excluded, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
(B)(iv) through July 13, 2021.

25 DATED: May 7, 2021

26 
27 HONORABLE RICHARD SEEBOORG
28 Chief United States District Judge